

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JILL BABCOCK,
MARGUERITE MADDOX,
and ASHLEY JACOBSON, on
behalf of themselves and all others similarly situated,

PLAINTIFFS,

-VS-

CLASS ACTION
JURY DEMAND

CASE No.: 22-cv-12951
JUDGE: JONATHAN J.C. GREY

**DECLARATION OF ASHLEY
JACOBSON**

STATE OF MICHIGAN,
COUNTY OF WAYNE,
CITY OF DETROIT, and
DETROIT-WAYNE JOINT BUILDING AUTHORITY,
DEFENDANTS, Jointly and Severally.

AMENDED DECLARATION OF ASHLEY JACOBSON

I, ASHLEY JACOBSON, PLAINTIFF, make this Declaration in lieu of an affidavit under 28 U.S.C. § 1746. I am aware that this Declaration will be filed in the United States District Court for the Eastern District of Michigan and that it is the legal equivalent of a statement under oath. I am willing to testify in person as to the following, and I also make a formal offer of proof to testify in camera or under protective order as to any of the personally identifiable information not disclosed below or in the motion due to the minority or other protected status of the persons as indicated below.

1. I am over the age of 18 and competent in all respects to make this Declaration. The facts contained herein are based upon my personal knowledge.
2. I am an attorney at the law firm Jacobson Law & Advocacy, PLLC, and a vocational counselor and consultant for Adaptive Inclusion, LLC, both of which were founded by me.
3. This Amended Declaration is offered to correct a scrivener's error in the date stated at paragraph 16 of my Declaration of Ashley Jacobson filed in support of Plaintiffs' Motion to Supplement Paragraph 56 of the Second Amended Complaint, ECF No. 119-4, PageID.1995 Filed 07/01/24 Page 3 of 9.
4. The current paragraph 16 reads as follows: I decided in the fall of 2023 that due to the case requiring in-person depositions and use of the CAYMC, I would seek out co-counsel to assist with the case. I would not have needed to do so, had the CAYMC not presented accessibility barriers.
5. However, as expressly noted on the first page of my Exhibit C-2 to my above declaration, attorney Brad H. Sysol appears as my co-counsel on December 19, 2022 when the Stanton complaint was filed in the Eastern District of Michigan.
6. Accordingly, the correct paragraph 16 of my Declaration should have stated as follows: "I decided in the fall of 2022 that due to the Stanton employment disability case against the City of Detroit likely requiring my access to the CAYMC, I would seek out co-counsel to assist with the case. I would not have needed to do so, had the CAYMC not presented accessibility barriers. I was personally aware of the CAYMC accessibility barriers from prior visits. Specifically, I was one of the volunteer attorneys of the ELDRS ad hoc

committee which is described at paragraph 165 of the Second Amended Complaint at ECF No. 79, Page ID.1363-1364 Filed 06/23/23 Page 100-101 of 138. As part of that ad hoc Committee I personally inspected the CAYMC the previous year in November 2021 for ADA/PWDCRA violations in the CAYMC, along with representatives of the City, the County, the Circuit and Probate Courts, and the Detroit Wayne Joint Building Authority. Attached to this Supplemental Declaration are the photographs and notes which I took during that visit in November 2021 with my cell phone.

7. If called as a witness to testify, I would competently testify to each fact contained in this Declaration.

Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that I have read the foregoing declaration consisting of seven (7) numbered paragraphs and that it is true and correct to the best of my knowledge, information, and belief.

Executed on this September 9, 2024.



Ashley Jacobson